

**IN THE UNITED STATES BANKRUPTCY COURT FOR
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

MIDNIGHT MADNESS DISTILLING

Debtor.

Case No.: 21-11750-PMM

Chapter 7 case

BONNIE B. FINKEL, in her capacity as Chapter
7 Trustee for Midnight Madness Distilling,

Plaintiff,

Adv. Pro. No.: 23-00047-PMM

v.

CASEY PARZYCH; SHAWN SHEEHAN;
ANGUS RITTENBURG, KELLY FESTA,
ASHLEIGH BALDWIN; MICHAEL BOYER;
R.F. CULBERTSON; GARY PARZYCH; RYAN
USZESNKI; POLEBRIDGE LLC; GOOD
DESIGN, INC.; AGTECH PA LLC; AGTECH VI,
LLC; XO ENERGY WORLDWIDE LLLP; XO
EW, LLC; CAN MAN LLC; BEST BEV, LLC;
ETOH WORLDWIDE, LLC; CANVAS 340, LLC;
FINLAND LEASING CO., INC.; and EUGENE T.
PARZYCH, INC.

Defendants.

MOTION FOR ADMISSION *PRO HAC VICE* OF CARLY S. EVERHARDT, ESQ.

Pursuant to Local Rule 2090-1(c) of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Steven L. Caponi, Esquire, hereby moves for the admission pro hac vice of Carly S. Everhardt, Esq. of K&L Gates LLP to appear as counsel for the Defendants AgTech PA LLC; AgTech VI, LLC; Ashleigh Baldwin; Best Bev, LLC; Michael Boyer; Canvas 340 LLC; R.F. Culbertson; EtOH Worldwide, LLC; Kelly Festa; Good Design, Inc.; Best Bev, LLC, Casey Parzych; Polebridge, LLC; Angus Rittenburg; Shawn Sheehan; XO EW, LLC; and XO Energy

Worldwide, LLLP (“Defendants”) in the above-captioned bankruptcy case.

1. A Verified Declaration of Ms. Everhardt is submitted herewith and incorporated herein by reference.

2. Movant, Steven L. Caponi, is a member in good standing of, *inter alia*, the Supreme Court of the Commonwealth of Pennsylvania, as well as the United States District Court for the Eastern District of Pennsylvania, and is local counsel for Defendants in this bankruptcy case.

3. Applicant will tender the required fee for *pro hac vice* admission.

WHEREFORE, Movant respectfully requests that this Honorable Court admit, *pro hac vice*, Carly S. Everhardt as counsel for Defendants, and for such other relief as is just and equitable.

Dated: October 1, 2024

K&L GATES LLP

/s/ Steven L. Caponi
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Entering Counsel for Defendants AgTech PA LLC, AgTech VI, LLC, Ashleigh Baldwin, Best Bev LLC, Michael Boyer, Canvas 340, LLC, R.F. Culbertson, EtOH Worldwide LLC, Kelly Festa, Good Design, Inc., Casey Parzych, Polebridge, LLC, Angus Rittenburg, Shawn Sheehan, XO EW, LLC, and XO Energy Worldwide, LLLP